



California Fair Political Practices Commission

October 5, 1988

Mr. W. R. Zoerb
Secretary/Treasurer, Local 1180
Fresno County Fire Fighters Association
P.O. Box 13025
Fresno, CA 93794

Your Request for Advice
Our File No. I-88-351

Dear Mr. Zoerb:

You have requested advice under the campaign disclosure provisions of the Political Reform Act (the "Act").^{1/} Your letter states only a general question. Therefore, we consider it to be a request for informal assistance pursuant to Regulation 18329(c) (copy enclosed).^{2/}

QUESTION

May an association transfer money from the association's separate benefit fund (general fund monies) to the association's political action committee? How is the transfer of funds reported?

CONCLUSION

The association may transfer funds from its separate benefit fund to its political action committee. The funds transferred are reported as monetary contributions to the political action committee from the association. For your information, FPPC Regulation 18419 (copy enclosed) provides detailed information for reporting contributions the committee receives from members of the association.

^{1/} Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

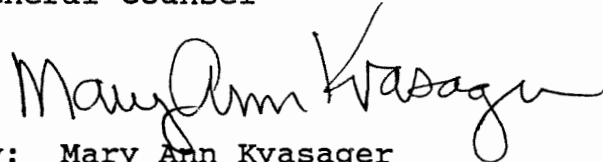
^{2/} Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice (Section 84113; Regulation 18329(c)(3).)

Mr. W. R. Zoerb
Page 2

If you need additional assistance concerning this matter,
please contact me at 916/322-5662.

Sincerely,

Diane M. Griffiths
General Counsel

A handwritten signature in cursive script, reading "Mary Ann Kvasager". The signature is written in dark ink and is positioned above the typed name and title.

By: Mary Ann Kvasager
Political Reform Consultant

Enclosures
DMG:MAK:



FRESNO COUNTY FIRE FIGHTERS ASSOCIATION

P.O. BOX 13025 • FRESNO, CALIFORNIA 93794

SEP 6 3 45 PM 1988 August 29, 1988


Mary Ann Kvasager
Fair Political Practice Commission
428 J St.
Sacramento Calif., 95814

Mary Ann,

I'm writing this letter in response to your conversation recently with Rudy Guadiana concerning certain issues about our newly formed P.A.C. fund. As I'm sure Rudy told you this is our first experience dealing with the proper procedures in making contributions to political issues and individuals. The main issue concerning us at present is whether or not it is proper to transfer monies from the Associations separate benefit fund to the P.A.C. fund, and if so how does this need to be documented.

I'd like to thank you for your time and consideration regarding this matter and to also request any additional material I might need to help in the future.

Sincerely,


W.R. Zoerb
Sec./Tres., Local 1180

**FRESNO COUNTY FIRE FIGHTERS ASSOCIATION**

P.O. BOX 13025 • FRESNO, CALIFORNIA 93794

SEP 6 3 46 PM '88 August 29, 1988

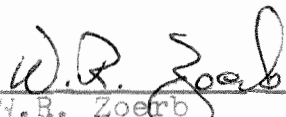
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W.R. Zoerb
Sec./Tres., Local 1180

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